

THE MISUSE OF CUSTOMS VALUATION DATABASES

POLICY STATEMENT

Prepared by the ICC Commission on Customs and Trade Facilitation

Summary

ICC is concerned about the increasing number of countries that use Customs valuation databases in violation of the WTO regulations by setting reference or minimum prices for import declarations. Cross-border traders are confronted with increased delays, uncertainty and higher trade costs. This policy statement cites several examples and provides recommendations for a way forward.

Introduction

The International Chamber of Commerce (ICC), as the world business organization speaking with authority on behalf of enterprises from all sectors in every part of the world, believes adherence to international rules and regulations – by both governments and businesses alike – is vital for an environment that fosters cross-border trade and investment.

Harmonized and predictable Customs valuation rules are essential to smooth trade flows and apparent deviations from international agreed upon rules and regulations would stifle international trade and economic growth. In this regard, ICC is highly concerned by the growing threat of the misuse of valuation databases and the application of various prohibited valuation methods generally known as “reference pricing.”¹

1) The Problem: Misuse of Customs Valuation Databases

Article 7.2 of the Customs Valuation Agreement (CVA) prohibits the use of a number of valuation methods, including:

- a) the selling price in the country of importation of goods produced in such country;
- b) a system which provides for the acceptance for Customs purposes of the higher of two alternative values;
- c) the price of goods on the domestic market of the country of exportation;
- d) the cost of production other than computed values which have been determined for identical or similar goods in accordance with the provisions of Article 6 of the CVA;
- e) the price of goods for export to a country other than the country of importation;
- f) minimum customs values²; or
- g) arbitrary, fictitious values.

The term that is used most often to refer to any or all of the above deviations is “reference pricing” although “indicative pricing” and “criterion pricing” are among the terms that are also employed. Although reference pricing is prohibited, it frequently manifests itself in the form of a valuation database that may be defined as a compilation of prices extraneous to the import transaction, often organized on a discrete tariff classification basis.

ICC recognizes that many of the countries that use databases and apply reference pricing are developing countries or emerging economies. In this regard, ICC is mindful that Customs duties and border taxes are a source of revenue for countries, and that developing countries are often faced with limited administrative and technical resources. Moreover, the informal economy accounts for a large percentage of import activity in those countries, while informal trade is characterized by a relatively lower level of reliable documentation and a higher incidence of fraudulent activity compared with formal trade. In this context, Customs valuation databases may serve as a helpful risk assessment tool. However, the aforementioned realities do not in any way allow for Customs valuation practices that involve reference pricing and stray from the CVA.

ICC believes that the misuse of Customs valuation databases to set reference or minimum prices threatens the vitality of the CVA, and may in fact force declarants to make inaccurate declarations

¹ This policy statement does not in any way deviate from the fact that ICC strongly condemns any fraud, evasion of duties or actions leading to market distortions by artificially lower prices (i.e. “dumping”). In such individual cases there should be a careful examination by the stakeholders involved and actions by exporters that may be deemed as dumping under WTO rules would be subject to WTO anti-dumping measures.

² Minimum import prices are likewise prohibited by the note to Article 4.2 of the WTO Agreement on Agriculture

and consequently imperil the international trading system itself. The various countries' practices that are evident departures from the approved Customs valuation rubric as set forth in the CVA, ought to be brought into conformity. It should also be noted that country practices that depart from the accepted order might dampen trade and inward investment – companies confronted with burdensome Customs processes often avoid making new investments or expanding their presence in the respective country.

2) Valid use: Risk assessment

The usage of a valuation database is only permissible for a narrowly defined objective that does not run afoul of Article 7.2 of the CVA as cited above. Article 17 permits countries to satisfy themselves as to the truth and accuracy of any statement, document or declaration presented for Customs valuation purposes.

The “guidelines on the development and use of a national valuation database as a risk assessment tool” of the Technical Committee on Customs Valuation (TCCV) of the World Customs Organization (WCO) state:

“[A]pplication of an appropriate risk assessment and management procedure enables Customs to exercise this right in a pragmatic manner. Such procedures may use, i.e. a valuation database.”³

The TCCV Guidelines note that a Customs administration may not:

- Determine the Customs value of imported goods, either as a substitute value or as a mechanism to establish minimum values;
- Reject the declared value solely on the basis of a difference between the declared value and the database values;
- Disregard the release of goods on sufficient guarantee in order to use a database; or
- Use a database as a substitute for other techniques, such as post-importation audits, to assess the truth or accuracy of the declared value.⁴

3) Actual practices: Misuse of databases to set reference pricing

Although the restrictions on the use of Customs valuation databases are clearly defined in the CVA and the TCCV Guidelines as highlighted above, ICC observes that an increasing number of countries make use of valuation databases in ways that are in direct conflict with the CVA. Although some of these countries state that they only use their valuation databases for risk management, the business community reports a different reality. In many occasions the violation occurs in the context of third party sales, i.e. arm's length sales, which are presumptively valid.⁵ Therefore, it should be acknowledged that this issue does not only concern related party pricing. In this context, ICC notes that the CVA mentions that (i) the test values can only be used at the initiative of the importer and, (ii) the test values cannot be used as a substitute for the declared value.⁶

³ Technical Committee on Customs Valuation (TCCV). Guidelines on the Development and Use of a National Valuation Database as a Risk Assessment Tool (2005) (para 6).

⁴ Ibid (para 18).

⁵ “Presumptively valid” refers to a situation in which the pricing is presumed valid, but subject to review. The burden of proof is on the party who would challenge the pricing.

⁶ WTO Customs Valuation Agreement, Interpretative Note 2 (c) to Article 1.

The business community is confronted by an increasing number of countries applying the Customs valuation databases in an inappropriate way. The below listed (anonymized) country examples serve to illustrate the proliferation of the abuses and the challenges traders face in the countries in question.

Country 1

In Country 1 rules are applicable that dictate that published or established dutiable value, or any other value reference regardless of the source, may not be used as a substitute value for Customs valuation. However, in practice, there have been various Customs' assessments where the authorities have applied reference values as substitutes for declared values. In such cases, importers were compelled to explain the use of the declared value and elevate the matter to a valuation committee and/or pay under protest.

Country 2

Country 2 applies the Customs valuation database to set reference prices by comparing the import price against a historical price on the same product or similar products. Any variance over 10% might trigger Customs to automatically challenge the price which leads to a burdensome task in defending the pricing – resulting in delays and high trade costs.

Country 3

Country 3 applies the Customs valuation database to set reference prices and Customs agencies challenge import prices when the declared prices are relatively low when compared to historically declared prices in the database. However, Customs fails to take into account that companies can apply a “target-based pricing” model in which the price would be determined based on the retail price in the market. Consequently, the price would be ultimately established between the seller and the local distributor based on competitive pressure and may vary depending on the market prices – leading to declared values that are legitimately lower than the historical prices.

Country 4

Country 4 uses the web-listed price of a good as a base price and applies a discount of 20% or 30% therefrom to derive a “reasonable price”. Following this, Customs requests a price uplift of the import price if the import price is lower than the calculated one. If the declared value of the imported good is lower, the Customs authority rejects the declared value while making reference to an alternative import price and arranging for an assessment for additional Customs duties.

Frequently no opportunity is provided to present the justification for the declared value in accordance with “transaction value” before the assessment is issued. The same applies for support as to the appropriateness of the alternative reference price to the specific circumstances provided by the relevant Customs authorities. Only after companies pursue matters through the appropriate appeal procedure (and commonly after a payment under protest of the additional Customs duty was made in order to clear the good) is due process allowed and are the facts and circumstances supporting the declared value reviewed and accepted. Moreover, even after resolving such matters with one local Customs official, it is not uncommon for the same national Customs authority or other Customs officials at other ports (at a later date and in respect of a different consignment of goods) to apply a similar approach to extract additional Customs duty using reference pricing database outputs.

Country 5

Country 5 sets weekly weighted average prices for commodities it deems sensitive, based on its Customs valuation database. Moreover, the government sells its database and its list of reference prices to other countries for their use.

Country 6

In Country 6, the declared Customs value is the Transfer Price between the foreign manufacturer and the local sales entity, i.e. 85% of the “end customer price”. Traders report that Customs sometimes deem the relationship between entities as having an influence on the intercompany transaction price. Protests supported by documents to substantiate the valuation filed by traders against the demand are often rejected, while additional duty, taxes and penalties are applied.

Furthermore, Customs makes calculations with reference to the prices of unrelated local partners in the market leading to an uplifted Customs value against the importers’ declared value – this price is even higher than the resale price to the end customer.

Country 7

In Country 7 imported shoes with a lower Customs value than the indicative price determined by the Ministry of Economy will be subject to an automatic import license. The permit must be requested online and requires detailed information on the goods, as well as a translation of all import documents into the local language.

Predictability and transparency of Customs procedures are vital for smooth cross-border trade flows and for investment. The country examples listed above illustrate that the inappropriate use of Customs valuation databases to set reference or minimum prices leads to delays in the clearance of goods, administratively burdensome procedures and higher trade costs.

4) Understanding commercial pricing practices

ICC would like to emphasize that there are legitimate business reasons why prices for the same good may vary. Advisory Opinion 2.1. of the TCCV on the ‘Acceptability of a price below prevailing market prices for identical goods’ states the following on the question whether a price lower than prevailing market prices for identical goods can be accepted for the purpose of Article 1 of the Agreement on implementation of Article VII of the General Agreement on Tariffs and Trade 1994: “The Committee considered this question and concluded that the mere fact that a price is lower than prevailing market prices for identical goods should not cause it to be rejected for the purposes of Article 1, subject of course to the provisions of Article 17 of the Agreement”.

There are many commercial pricing practices applied by cross-border traders that may result in a lower declared value than indicated by the Customs valuation databases. In this regard, the examples below might be helpful to increase the awareness among Customs administrations that prices might be lower for valid commercial reasons.

a) Differences in pricing for products falling within the same tariff heading

Business rationale:

There are often valid reasons for disparities in pricing between importations of goods falling within the same tariff provision. At times the disparities may be very wide and therefore there

is no practical value to apply a comprehensive, “one size fits all” value derived from a database compiled on a tariff provision basis. This can be further clarified by taking the importation of bicycles as an illustration.

In some countries bicycles are classified for tariff purposes in heading 8712 of the Harmonized Tariff System. It is clear that not all bicycles are the same and that not all bicycles carry the same price. Therefore, their Customs value will vary according to their price, which is a function of their differences, including their physical composition. This acknowledgment is essential to realizing the limitations of the valuation databases. A bicycle that has been built for use in professional sporting events will be ultra-light and benefit from all the latest technology. Such a high quality-bicycle will ordinarily be far more expensive than a bicycle built for everyday use. It would be a significant error to apply the higher cost of the racing bicycle to all other imported bicycles just as it would be an error to apply the lower cost of the conventional bicycle to the racing bicycle. Similarly, it is important to note that prices for the identical item may vary with time, as the market price may rise and fall. It would therefore not be logical or fair for a Customs authority to insist on a former Customs value. The above thus raises the question of how a valuation database could help in finding a Customs value for bicycles or other products.

Type of evidence Customs may expect:

Presentation of a valid commercial invoice, product specifications showing the configuration of the article, special provenance of the imported article, other factors showing comparability or not, as well as proof of payment.

b) Launching in (new) markets by allocating Advertising Marketing Promotional (AMP) funds

Business rationale:

Multinational enterprises (MNEs) with groups of branded goods may use a sole distributor arrangement in early stage market penetration or to launch a new product in a market. Under these arrangements, the pricing for a newly introduced product will be negotiated taking into account the expectation that the distributor will spend a disproportionate share of marketing funds on advertising and brand building for the new product. In fact, it is often the case that the sole distributor is contractually obliged to invest on its own account significant AMP funds to seed the brand and build awareness and affinity with new consumers in market. For example, MNE sales of established products to the distributor may be typically discounted from the manufacturer’s suggested retail price by 30% to 40%, while new product sales are discounted by 66%. In this scenario, the import price for the new product will be lower than import prices of more established brands of similar goods in the same market so as to enable the sole distributor to resell the new product at a competitive price in the market, and earn a sufficient return. If the import price was higher, the sole distributor could end up making an inappropriately low profit, or even operating at a loss, in a way that would no longer make it commercially viable for the distributor to continue doing business with the MNE group.

Type of evidence Customs may expect:

Presentation of signed distribution agreement between MNE group and sole distributor showing obligation for AMP investment, copies of third party invoices to the sole distributor for AMP-related goods and services, invoices and payment records for the new product, coupled with evidence that the distributor’s chart of accounts shows no other payments to the MNE which are additions to transaction value.

c) Importing goods at discount prices*Business rationale:*

In a dynamic business environment, an entrepreneur concludes a distribution agreement with a distributor, related or non-related, ensuring that risks and responsibilities are properly divided between both actors, in line with the role of the parties. There are a number of operating principles listed below as an example:

- Company A will set the product price for the distributor in such a way that he is able to cover his costs (distribution, sales and promotion/marketing) while also making a profit.
- Company A may sometimes communicate the maximum recommended resale price per product but it is understood that the distributor alone determines the price at which it resells in the market and is therefore responsible for the profit he is making.
- Company A will establish and communicate the yearly marketing fund level (in local currency or USD) based on forecast plans – this can be changed during the year upon mutual agreement. It would be provided in total with suggested split by brand.
 - It is clear that if it comes to the marketing fund, the distributor is spending his or her money – this is not the money of Company A, and should not be referred to as such.
 - The marketing fund would be spread among the total value of the product acquired by the distributor in order to have a common percentage discount on each single product. This will lead to greater stability of the import prices.
 - This method will ask for internal re-balancing of marketing spending inside the books of Company A to reflect the real spent by brand/category- if justified by materiality.
- Company A will order and pay for the advertising expenses in the market (TV, radio, print, Internet) either directly or through a dedicated third party agency. This approach will result in additional Customs duty (30%) and VAT (17%) expenses. This is however seen as necessary to maintain the consistency of the 'Global Distributor Model' and avoid exposing the distributor to a difficult decision whether to spend the money on advertising or 'move it to profit'. The additional benefit is that such equity building expenses would clearly support the claim of Company A to all intellectual property created over time in the market.

Type of evidence Customs may expect:

Distribution agreement between entrepreneur-Company A and related or non-related distributor.

d) Differences in intra-portfolio pricing depending on the competition in the market:*Business rationale:*

Many MNE Consumer Packaged Goods groups will adopt a diversified portfolio approach to branded goods. This enables the group to compete across various consumer price points for maximum market penetration. In such circumstances, the product portfolio in any individual market will contain goods of very different price points within the same harmonized system subheading, ranging from luxury custom made, to standard mass market, to low value category entry. It is challenging for Customs officers to assess the differences in the specific product types which may result in “comparing apples and oranges”.

For example, companies may set pricing for imported goods after taking into account the effects of intellectual property rights (IPR) factors: the quality of the goods, their reputation and the existence of a trademark influence the price. The CVA recognizes that a premium attached to trademark differences in otherwise similar imported articles may affect whether an imported article is “similar” to another for customs valuation purposes.⁷ The CVA specifically lists these same variables – i.e. the products compared ought to be examined closely taking this into account.

Type of evidence Customs may expect:

Presentation of product marketing material and product fact sheets to establish comparable or distinctive features (e.g. IPR factors).

e) Duty free channels:*Business rationale:*

Duty free operators selling branded goods generally sell direct to end consumers and therefore operate at a different commercial level and in a different business environment to traditional importer/wholesalers. In traditional importer/wholesaler scenarios, additional system profit is required to appropriately remunerate other participants in the value chain. Furthermore, differences in the travel retail channel (e.g. the existence of a captive consumer group at airports) may drive differences in AMP strategies and the resulting expenditures. These commercial differences are generally reflected in different import prices for identical goods in any one particular market.

Type of evidence Customs may expect:

Demonstrated differences in the commercial level of trade.

⁷ WTO Customs Valuation Agreement, Article 15.

5) Effect of Reference Pricing

The examples above demonstrate that Customs valuation databases are being used to promote reference pricing – i.e. valuation based upon substitute or minimum pricing. This marks a return to the “normal value” concept of the Brussels Definition of Value⁸ and violates the “positive” basis of the price actually paid or payable which is the core principle of transaction value under the CVA. The setting of reference pricing constitutes application of arbitrary and unreliable methods and consequently poses a challenge to the internationally agreed upon rules of the CVA.

ICC is highly concerned that cross-border trade flows will be significantly hampered without a fair and predictable Customs valuation regime based on the CVA. ICC’s concerns have been echoed by several countries⁹, moreover, the setting of reference pricing has also been the subject of several WTO Dispute Settlement cases.

To conclude, reference pricing should not play a role in Customs valuation and is unacceptable to all who apply the CVA in good faith. Concerned WTO Members could challenge each of these abuses on an individual basis under the WTO Dispute Settlement process resulting in affirmative findings of abrogation of commitments under the CVA.

6) The way forward

Recognizing the context and challenges raised above, ICC appeals to the WTO, WCO and their member states to take the following recommendations into due consideration.

Recommendation 1: Conduct a rigorous and comprehensive assessment

The business community has noted abuses in several countries as illustrated in Section 3 of this statement. However, in order to address the problem in a comprehensive way, diagnostics are required and should be undertaken by an intergovernmental organization such as the WTO or the Organisation for Economic Co-operation and Development (OECD).

Recommendation 2: Follow the TCCV Guidelines

Countries that make use of databases should apply the TCCV Guidelines dictating the proper use of the valuation databases. Per the TCCV Guidelines, the use of valuation databases in these matters should be limited to that of a risk assessment tool instead of a stand-alone and limited substitute for the determination of Customs value. In this regard, it should also be underlined that although valuation databases could be helpful as a risk assessment tool, they provide merely one instrument.

It is challenging to collect and maintain up-to-date data on all products across the full range of tariff classification provisions. Invoice descriptions are often inadequate and prices may also vary based on e.g. quantities purchased, levels of trade involved, functions to be undertaken by the buyer, presence of trademarks, effects of time of purchase, etc. One additional important weakness of a valuation database is that its use tends to diminish the dialogue with both the importer in a particular import transaction as well as with the business sector in general. A more efficient means of risk

⁸ Annex I, Convention on the Valuation of Goods for Customs Purposes, December 15, 1950, 171 U.N.T.S. 307 (entered into force July 28, 1953). Normal value is defined as the price which [the imported goods] would fetch at the time when the duty becomes payable on a sale in the open market between buyer and seller independent of each other.

⁹ Countries have raised their concerns in meetings of the WCO’s Technical Committee on Customs Valuation, the WTO’s Committee on Customs Valuation and in an informal WTO Workshop on Valuation Databases and Reference Pricing organized on 24 October 2014.

management could be built around a high degree of collaboration and dialogue with the private sector – enabling the Customs authority to develop a greater awareness of commercial factors that affect pricing. Another approach could be built around the use of advance rulings and post-clearance audits – two strategies based upon an exchange of information between the importer and the Customs authorities. See also recommendations 5 and 6 below.

Recommendation 3: Greater transparency and predictability

ICC calls for transparent and predictable border procedures to facilitate cross-border trade and investment. In this light, there should be an authoritative listing of countries that use customs valuation databases – also taking into consideration the assessment results obtained through Recommendation 1 above. Furthermore, countries that use Customs valuation databases should abide by their responsibility to provide greater administrative due process in their procedures¹⁰: misunderstandings could be cleared up and issues easily resolved if the importer has timely access to the basis for the Customs action and if Customs authorities seek information from the importer at the outset. Moreover, Article 16 of the CVA states that the importer shall have the right to an explanation in writing from the Customs administration as to how the Customs value of the importer's goods was determined.

Recommendation 4: Capacity-building and technical assistance

ICC calls for increased capacity-building and technical assistance for developing countries. Such assistance should focus on positive reinforcement, the exchange of best practices and guidance on the proper use of databases.

Capacity-building would enhance a more focused and proper use of valuation databases considering that the current misuse of databases is often based on:

- Limited sample size of import transactions, not subject to statistically significant analysis or standard methodology;
- Insufficient understanding of the parties and nature of transactions;
- Insufficient appreciation for the pricing effects of differences in business contract terms and conditions applied to sales; or
- Insufficient technical knowledge at Customs' headquarters and local ports where import declarations are reviewed.

In this context, ICC welcomes the WTO's Trade Facilitation Agreement that contains provisions for technical assistance and capacity-building for enhanced border and Customs operations in developing countries and calls upon all WTO members to ratify and implement the Trade Facilitation Agreement as soon as possible.

¹⁰ Obligations are imposed by the WTO Trade Facilitation Agreement and in the context of the Customs valuation process, due process protections are embedded throughout the CVA, including, inter alia, Article 1 (communicating grounds for considering that the relationship has influenced the price), Article 10 (confidential treatment), Article 11 (right of appeal) and Article 12 (publication of laws and regulations). See also, Decision 6.1 of the WTO Customs Valuation Committee.

Recommendation 5: Customs-Business Partnership

ICC calls for enhanced Customs-Business dialogue and collaboration noting that legitimate traders (e.g. Authorized Economic Operators) also have a vested interest in ensuring that imported goods are properly valued, border procedures are transparent and predictable and unnecessary delays in the clearance of goods are prevented.

The experience of the public-private partnership in the context of the WCO Standards to Secure and Facilitate Global Trade (SAFE) Framework on border security is an example of the benefits that accrue through partnerships.

In this regard, ICC welcomes the 2015 WCO Customs-Business Partnership Guidance that provides a detailed approach together with several best practices for developing a robust sustainable partnership mechanism. The WCO Guidance assists countries in the implementation of relevant provisions of the WTO Trade Facilitation Agreement that foresee closer cooperation with private sector stakeholders.

Recommendation 6: Greater use of advance rulings and post-entry audits

ICC calls for a greater use of advance rulings and post-entry audit to prevent fraud and to ensure that the Customs value of imported goods is properly ascertained. This has also been recommended by the WCO and by many countries¹¹, and is encouraged in the WTO's Trade Facilitation Agreement. Such procedures would be far more effective than applying reference pricing methods.

Recommendation 7: Promote use of "Green Lane" programs

As countries have indicated that the challenges for fraud prevention mainly concern informal traders, it follows that an effective and efficient risk analysis system should lead to a focus on that sector.

ICC calls upon countries to create an environment in which formal traders – to be defined at a minimum as those traders that can provide authentic transactional documents to support the Customs entry – are given an opportunity to import unhampered by the constraints applied to the informal sector. Further to Proposal 5 above, partnerships with the legitimate trade community should be a source for developing mutually beneficial programmes.

Recommendation 8: Pursue WTO dispute settlement

ICC calls upon WTO Member States to ensure that their fellow WTO Members abide by the CVA obligations – most notably in regard to reference pricing practices. Such efforts at defending trade law rights should include consultation and, if necessary, initiation of actions under the WTO Dispute Settlement process. A growing body of law on this point would be normative and would dissuade countries from engaging in practices that have been found to be in violation.

¹¹ Many countries encourage advance rulings and post-entry audits. Moreover, the WCO's Revenue Package includes a Common Infrastructure on the Provision of Advance Rulings on Classification, Origin and Valuation, wherein the WCO refers to its recommendations to employ advance rulings across all three disciplines.

7) Conclusion

This policy statement reflects the deep concern of ICC about the misuse of Customs valuation databases to set reference or minimum prices. ICC welcomes the engagement of all other parties who are committed to observe internationally agreed upon trade rules in good faith. ICC will continue to monitor developments in this important area and will issue an update of this policy statement if needed.

The International Chamber of Commerce (ICC)

ICC is the world business organization, a representative body that speaks with authority on behalf of enterprises from all sectors in every part of the world.

The mission of ICC is to promote open international trade and investment and help business meet the challenges and opportunities of globalization. Its conviction that trade is a powerful force for peace and prosperity dates from the organization's origins early in the 20th century. The small group of far-sighted business leaders who founded ICC called themselves "the merchants of peace".

ICC has three main activities: rule setting, dispute resolution, and policy advocacy. Because its member companies and associations are themselves engaged in international business, ICC has unrivalled authority in making rules that govern the conduct of business across borders. Although these rules are voluntary, they are observed in countless thousands of transactions every day and have become part of the fabric of international trade.

ICC also provides essential services, foremost among them the ICC International Court of Arbitration, the world's leading arbitral institution. Another service is the World Chambers Federation, ICC's worldwide network of chambers of commerce, fostering interaction and exchange of chamber best practice. ICC also offers specialized training and seminars and is an industry-leading publisher of practical and educational reference tools for international business, banking and arbitration.

Business leaders and experts drawn from the ICC membership establish the business stance on broad issues of trade and investment policy as well as on relevant technical subjects. These include: banking, commercial law and practice, competition policy, corporate responsibility and anti-corruption, customs and trade facilitation, the digital economy, environment and energy, intellectual property, marketing and advertising, taxation, and trade and investment policy.

ICC works closely with the United Nations, the World Trade Organization and intergovernmental forums including the G20.

ICC was founded in 1919. Today its global network comprises over 6 million companies, chambers of commerce and business associations in more than 130 countries. National committees work with ICC members in their countries to address their concerns and convey to their governments the business views formulated by ICC.

INTERNATIONAL CHAMBER OF COMMERCE

33-43 avenue du Président Wilson, 75116 Paris, France

T +33 (0)1 49 53 28 28 F +33 (0)1 49 53 28 59

E icc@iccwbo.org www.iccwbo.org